

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

RIPPY OIL CO.

Plaintiff

CIVIL ACTION

v.

NO.:

ACE AMERICAN INSURANCE CO.,
CHARTIS SPECIALTY INSURANCE CO., JUDGE
RISK SPECIALISTS COMPANIES
INSURANCE AGENCY, INC.

Defendants

DECLARATION OF TANYA E. KENT

1. I, Tanya E. Kent, am a person of the full age of majority and am competent to testify to all matters herein, and I am familiar with all facts, issues, and papers referenced herein.

2. I am the Clerk (i.e., corporate secretary) of Risk Specialists Companies Insurance Agency, Inc. (“Risk Specialists”).

3. Risk Specialists is a surplus lines insurance producer.

4. Risk Specialists is incorporated in Massachusetts.

5. In its governing documents and corporate filings, Risk Specialists lists its principal place of business as Boston, Massachusetts.

6. None of Risk Specialists’ officers or directors is located in Texas.

7. Risk Specialists does not direct, control, or coordinate its business out of Texas.

8. Risk Specialists’ Louisiana surplus lines license was issued on November 28, 2007 and expires on March 31, 2022.

9. Chartis Specialty Insurance Company, now known as AIG Specialty Insurance Company, an eligible surplus lines insurer, issued Umbrella Policy Number BE 13074559 in effect from March 31, 2010 to March 31, 2011 (hereinafter referred to as “the ASIC Policy”) to Knight Oil Tools Inc. in Lafayette, Louisiana (hereinafter referred to as “KOT”).



10. Knox Insurance Group, LLC, located in Lafayette, Louisiana (hereinafter referred to as “Knox”), was the producing surplus lines broker for KOT on the ASIC Policy.
11. Knox engaged Risk Specialists to secure insurance in the surplus lines market on behalf of KOT.
12. Knox was the entity responsible for collecting from the insured the surplus lines premium tax due on the premium for the ASIC Policy and remitting such taxes to the taxing authority in Louisiana.
13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of January, 2022.



TANYA KENT